

OFFICIAL FILE

ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

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COMMERCE COMMISSION  
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CHIEF CLERK'S OFFICE

Central Illinois Public Service Company (Ameren CIPS), )  
Union Electric Company (AmerenUE), Central Illinois )  
Light Company, Commonwealth Edison Company, )  
Illinois Power Company, MidAmerican Energy Company, )  
Northern Illinois Gas Company d/b/a Nicor Gas Company )  
North Shore Gas Company and Peoples Gas Light and )  
Coke Company, )

Petition for Permanent Approval of an Additional Method )  
to Determine when Deposits may be required from )  
Applicants for Residential Service, in addition to those )  
Methods Set Forth in 83 Ill. Admin. Code § 280.50(a). )

ICC Docket No. 01-0644

**COOK COUNTY STATE'S ATTORNEY'S OFFICE**  
**PETITION FOR LEAVE TO INTERVENE**

**NOW COME** the COOK COUNTY STATE'S ATTORNEY'S OFFICE by and through RICHARD A. DEVINE, State's Attorney of Cook County, pursuant to the Rules of Practice of the Illinois Commerce Commission, 83 Ill. Admin. Code, Section 200.200, and pray for leave to intervene and be made a party in the above-captioned proceeding. In support of this Petition, the COOK COUNTY STATE'S ATTORNEY'S OFFICE state the following:

1. That the People of Cook County are utility consumers within the State of Illinois and the State's Attorney represents these consumers in order to assure their utility rates are reasonable and to protect the public interest.
2. That the People of Cook County, as utility consumers, will be affected by any order entered by the Commission in this proceeding and that the Cook County State's Attorney's Office is accordingly interested in this proceeding.

3. The State's Attorney has the duty to represent the interests of the People of Cook County and has a substantial interest in ensuring that the Order entered in the instant proceeding is consistent with the terms of the Public Utilities Act and sound public policy.

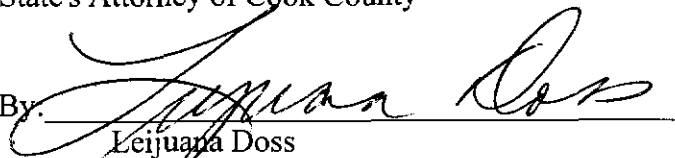
**WHEREFORE**, for the above-stated reasons, the Proposed Intervenor prays that leave to intervene be granted by this Commission and that the COOK COUNTY STATE'S ATTORNEY'S OFFICE be made a party to the above-captioned proceeding.

Respectfully submitted,

**RICHARD A. DEVINE**  
State's Attorney of Cook County

Dated: November 26, 2001

By.

  
Lejuana Doss  
Assistant State's Attorney  
Environment and Energy Division

**MARK N. PERA**  
Assistant State's Attorney  
Supervisor  
Environment and Energy Division

**MARIE SPICUZZA**  
Assistant State's Attorney  
Deputy Supervisor  
Environment and Energy Division

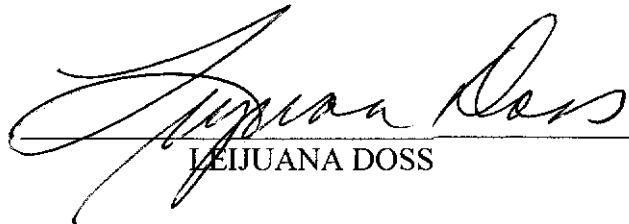
**LEIJUANA DOSS**  
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Environment and Energy Division  
69 West Washington, Suite 700  
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Telephone: (312) 603-8625  
Fax: (312) 603-9835

STATE OF ILLINOIS       )  
                                      ) SS.  
COUNTY OF C O O K       )


**VERIFICATION**

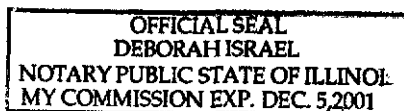
**NOW COMES LEIJUANA DOSS**, who, affirms, deposes and says:

1.       That she is an Assistant State's Attorney in Cook County assigned to represent the Cook County State's Attorney's Office in any proceedings in connection with the attached PETITION FOR LEAVE TO INTERVENE; and
2.       That he has read the attached PETITION FOR LEAVE TO INTERVENE and that the facts alleged therein are true and correct to the best of his knowledge and belief.

  
LEIJUANA DOSS

SUBSCRIBED and AFFIRMED to  
before me this 26<sup>th</sup> day of  
November 2001.

  
Notary Public



**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Central Illinois Public Service Company (Ameren CIPS), )	
Union Electric Company (AmerenUE), Central Illinois )	
Light Company, Commonwealth Edison Company, )	
Illinois Power Company, MidAmerican Energy Company, )	
Northern Illinois Gas Company d/b/a Nicor Gas Company )	
North Shore Gas Company and Peoples Gas Light and )	ICC Docket No. 01-0644
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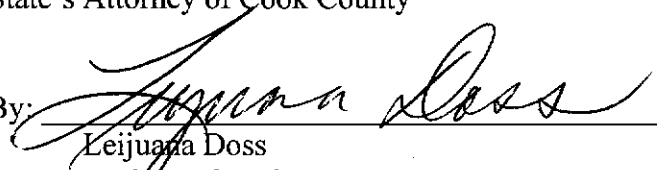
**NOTICE OF FILING**

TO: See Attached Service List.

**PLEASE TAKE NOTICE** that on this date, November 26, 2001, we have filed by sending by Federal Express today to the Chief Clerk of the Illinois Commerce Commission the enclosed Petition For Leave To Intervene in the above-captioned docket.

**RICHARD A. DEVINE**  
State's Attorney of Cook County

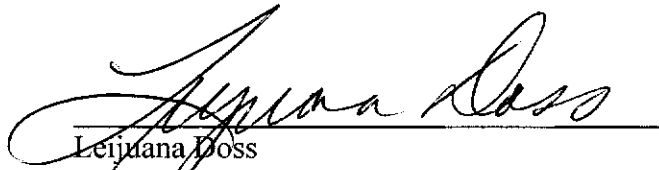
By: \_\_\_\_\_

  
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STATE OF ILLINOIS       )  
                                  ) SS.  
COUNTY OF C O O K     )

**CERTIFICATE OF SERVICE**

**I, LEIJUANA DOSS**, hereby certify that a copy of the enclosed Petition For Leave To Intervene was served on all parties on the attached list on the 26<sup>th</sup> day of November 2001, by hand delivery, Federal Express, electronic mail, or U. S. first class mail prepaid.

  
\_\_\_\_\_  
Lejuana Doss  
Assistant State's Attorney

## SERVICE LIST

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